

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

LUIS ANTONIO VELEZ PEREZ

Debtor(s)

Case No. **11-06227 ESL**

Chapter 13

**MOTION OPPOSING DISMISSAL AND REQUESTING
ADDITIONAL TIME TO COMPLY**

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. Confirmation hearing in present case was rescheduled for December 14, 2011. Motion to dismiss held under advisement is due today.
2. Debtor uploaded some of the documents that were requested by the trustee, but the evidence in support of valuation of a donated real estate property is still pending
3. Debtor already made arrangements to perform an appraisal, but has not received the document yet. He also promised to bring again other documents already sent, but that were not completely readable, unfortunately his youngest brother died last week due to a motorcycle accident and he is attending this difficult matter during the weekend and is today at the funeral home.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and to deny motion requesting dismissal and grant debtor thirty (30) additional days to complete the information and missing documents for the trustee.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of this motion has been filed with the Clerk of the Court that will send notice to the Chapter 13 trustee Alejandro Oliveras Rivera and all other appearing parties using the CM/ECF system.

In Vega Baja, Puerto Rico, this day October 17, 2011

s/ Juan O. Calderon Lithgow
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
PO BOX 1710
VEGA BAJA, PR 00694-1710
TEL.: 787-858-5476
Email: caldlithlaw@gmail.com